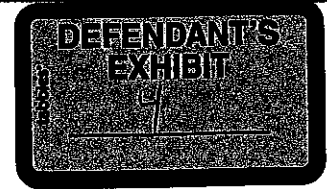


Stephen Williams

From: Stephen Williams
Sent: Thursday, June 6, 2019 2:15 PM
To: 'Berry, Tracy (USAMOE)'
Cc: Justin Kuehn; McMurtry, Dorothy (USAMOE)
Subject: Discovery - U.S. v. Thomas Hobbs - 19-386



Dear Ms. Berry,

I am writing to raise two issues concerning discovery and to follow up on another. First, The discovery production did not include any report concerning a fingerprint analysis done on either the firearm or the seized case containing the firearm. Please confirm that there was not any fingerprint analysis done. If such an analysis was done, and did not reveal my client's fingerprints, then I would consider that to be Brady material and ask that the reports be produced. Second, pursuant to our discovery request and Rule 16(E)(i) & (ii), I request access to the firearm and case in order to conduct a visual inspection. Lastly, in accordance with the Court's order concerning discovery I left you a telephone message in order to personally confer in follow up to my request for the unredacted search warrant (see below). A request to which you have not responded either way. If you do not intend to produce the unredacted search warrant then please notify me by telephone or email by close of business today so that I can prepare a motion for disclosure in sufficient time so as to not disrupt the current schedule concerning pretrial motions.

Stephen C. Williams

Attorney

KUEHN, BEASLEY & YOUNG, P.C.

23 South 1st Street

Belleville, IL 62220

Phone: 618-277-7260

Fax: 618-277-7718

From: Stephen Williams

Sent: Monday, June 3, 2019 6:21 PM

To: Berry, Tracy (USAMOE) <Tracy.Berry@usdoj.gov>

Cc: McMurtry, Dorothy (USAMOE) <Dorothy.McMurtry@usdoj.gov>; Justin Kuehn <JustinKuehn@kuehnlawfirm.com>

Subject: RE: Thomas Hobbs

Ms Berry and Ms McMurtry:

I have reviewed the redacted affidavit for the search warrant in Mr. Hobbs case. To my surprise, ALL of the specific facts related to the probable cause determination have been redacted. This includes most of page 7, the entirety of pages 8 – 44, and most of page 45. As you are no doubt aware, we cannot evaluate the sufficiency of probable cause in support of the warrant in order to decide whether to make a motion to suppress without this information. Please produce an unredacted copy of the warrant affidavit ASAP so we do not need to make a motion to the Court.

Stephen C. Williams

Attorney

KUEHN, BEASLEY & YOUNG, P.C.

23 South 1st Street

Belleville, IL 62220

Phone: 618-277-7260

Fax: 618-277-7718

From: Berry, Tracy (USAMOE) <Tracy.Berry@usdoj.gov>

Sent: Monday, June 3, 2019 7:59 AM

To: Stephen Williams <SWilliams@kuehnlawfirm.com>

Cc: McMurtry, Dorothy (USAMOE) <Dorothy.McMurtry@usdoj.gov>

Subject: Thomas Hobbs

The redacted search warrant affidavit has been added to USAfx.